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Attorneys for Debtors

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA

**In re:**

**No. 08-46410 RN**

**RICHARD LAWRENCE GIFFORD and  
VALERIE FAYE GIFFORD,**

**Chapter 13**

**Debtors.**

**MOTION TO MODIFY CHAPTER 13 PLAN;  
NOTICE TO CREDITORS OF  
DEADLINE TO REQUEST A HEARING**

The above-named debtors apply to the court for an order to modify their Chapter 13 Plan as follows:

Commencing September 2010, debtors will pay \$775.00 to the Trustee. Beginning October 2010 and continuing thereafter debtors will pay \$1,713.00. Any arrearages shall be forgiven. Unsecured, non-priority creditors shall be paid on a pro-tanto basis.

The modification is sought on the following grounds:  
Mrs. Gifford had been unemployed for several months but has recently gained employment. Debtors can now afford to make their plan payments.

**NOTICE IS HEREBY GIVEN:**

(i) That Local Rule 9014-1 of the United States Bankruptcy Court for the Northern District of California prescribes the procedures to be

1 followed and that any objection to the requested relief, or a request for  
2 hearing on the matter must be filed and served upon the undersigned  
3 within twenty one (21) days of mailing of this notice;

4 (ii) That a request for hearing or objection must be accompanied  
5 by any declarations or memoranda of law the party objecting or requesting  
6 wishes to present in support of its position;

7 (iii) That if there is not a timely objection to the requested  
8 relief or a request for hearing, the Court may enter an order granting  
9 the relief by default; and

10 (iv) That the undersigned will give at least seven (7) days written  
11 notice of hearing to the objecting or requesting party, and to any  
12 trustee or committee appointed in the case, in the event an objection or  
13 request for hearing is timely made.

14 Dated: August 27, 2010

15 /s/ Corrine Bielejeski  
16 CORRINE BIELEJESKI  
17 Attorney for Debtors  
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